

1.  
UNITED STATE BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

FILED  
U.S. BANKRUPTCY COURT

2022 MAR 18 PM 3:20

IN RE:

CHAPTER 11  
S.D. OF N.Y.  
CASE NO. 19-23649 (RAD)

PURDUE PHARMA L.P., ET AL.,  
CREDITOR.

(ADD ON TO CLAIM NO.'S  
628425 AND 628775.)

- PERSONAL INJURY -  
REQUEST TO ADD ON TO THE ABOVE CLAIMS  
CREDITOR PRESENTS THE FOLLOWING

- 1.) DEBTORS PROMOTED OPIOIDS IN A COERCIVE AND DECEPTIVE MANNER AND FRAUDULENTLY PROMOTED OPIOIDS.
- 2.) DEBTORS ISSUED AND DISTRIBUTED OPIOIDS BASED ON FRAUDULENT MISREPRESENTATION ABOUT ITS EFFICIENCY AND SOLD WITHOUT ADEQUATE INSTRUCTIONS AND WARNINGS.
- 3.) DEBTORS COMMITTED COMMON LAW FRAUD, FALSE ADVERTISING, NEGLIGENCE, RACKETEER INFLUENCED AND CORRUPTION ORGANIZATION VIOLATED PRODUCT LIABILITY ACTS.
- 4.) DEBTORS CONCEALED FOR THEIR OWN FINANCIAL GAIN THE RISKS OF ADDICTION AND ATTENDANT HARM PRESCRIPTION OPIOIDS PRESENT ALL WHILE PROMOTING EVER-INCREASING CONSUMER USE.



- 5.) DEBTORS KNOWINGLY FLOODED ITS PAIN PILLS WITH OPIOIDS KNOWING THAT THE DRUGS WERE LIKELY TO BE ABUSED, DIVERTED OR MISUSED.
- 6.) DEBTORS GAVE FINANCIAL COMPENSATION TO CO-DEFENDANTS TO GIVE FALSE MESSAGES ABOUT OPIOIDS AND THE DEBTORS TURNED A BLIND EYE TO THE CO-DEFENDANTS OVER PRESCRIBING OPIOIDS.
- 7.) DEBTORS FAILED IN THEIR DUTY TO PREVENT OR ACTIVELY CONCEAL OPIOID DIVERSION AND MISUSE. DEBTORS WERE RESPONSIBLE FOR UPDATING THEIR LABELS AT ALL TIMES.
- 8.) DEBTORS MADE REPRESENTATIONS THAT WERE NOT SUPPORTED BY SCIENTIFIC STUDIES, THUS PREVENTING CLINICIANS AND CONSUMERS FROM MAKING INFORMED DECISIONS ABOUT WHETHER TO PRESCRIBE OR TO USE OPIOIDS AS A PRIMARY FORM OF CHRONIC PAIN TREATMENT. THE DEBTOR USED ITS STRATEGIES TO EVADE CONSUMER PROTECTION LAWS AND USED FRONT GROUPS OR THIRD PARTIES TO PROMOTE OPIOIDS AS SUPERIOR PAIN MEDICATION THROUGH UNBRANDED MATERIALS.
- 9.) DEBTOR ENGAGED IN A COURSE OF REPETITIVE CONDUCT THAT CAUSED HARM OF A SUBSTANTIAL MAGNITUDE BY CAUSING AN INTERNATIONAL PERSISTENT COURSE OF DECEPTIVE CONDUCT.
- 10.) DEBTORS CONSPIRED WITH PHYSICIANS TO DEFRAUD INSURERS INTO AUTHORIZING REIMBURSEMENTS FOR ITS OPIOID PRODUCTS,



DEBTORS HARBORED A SPECIFIC INTENT TO INJURE THE INSURER AND UPON ACCEPTING AS TRUE THAT THE DEBTORS EMPLOYEES ACTED WITHIN THE SCOPE OF THEIR EMPLOYMENT AND INTENTIONALLY USED FALSE INFORMATION TO INDUCE THE INSURER TO PAY CLAIMS IT OTHERWISE WOULD NOT HAVE.

- 11.) DEBTORS MATERIALLY DECEPTIVE ACTS AND PRACTICES BY THE DEBTOR THAT UNDERMINE CONSUMERS ABILITY TO ACCESS THE BENEFITS AND DANGERS OF PRESCRIPTION OPIOIDS AND TO MAKE INFORMED DECISIONS AS TO THE EFFICIENCY AND SAFETY OF OPIOIDS FOR CHRONIC PAIN. CREDITOR SUFFERED DIRECT INJURIES AS A RESULT OF THE DEBTORS DECEPTIVE ACTS AND PRACTICES.

RESPECTFULLY SUBMITTED  
S/ Larry Dale Eugene  
LARRY DALE EUGENE